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June 28, 2022

LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

Application GRANTED. Defendant's deadline to answer or otherwise respond to the complaint is extended to July 6, 2022. The initial pretrial conference is ADJOURNED to August 3, 2022, at 4:00 P.M. The parties shall call 888-363-4749 and enter the access code 558-3333. The parties shall file the joint letter and the proposed case management plan by July 27, 2022.

Dated: June 28, 2022
New York, New York

RE: Rockovich v. Deejayzoo LLC d/b/a SHHHOWERCAP
22-CV-3428 (LGS)

Dear Your Honor:

My firm, Brustein Law PLLC, represents Plaintiff Theresa Rockovich ("Plaintiff") in the above matter, and in that capacity, I write in response to the Court's June 24, 2022 Order to advise the Court of the status of the proceedings and to respectfully request an extension of the deadlines. On June 27, 2022, the undersigned communicated with Christopher Frost, Esq., California Counsel for Defendant, Deejayzoo, LLC d/b/a Shhhowercap ("Defendant") about the Court's June 24, 2022 Order. Mr. Frost advised the undersigned that he was in the process of obtaining local counsel to appear in this action. Mr. Frost further confirmed that Defendant was properly served and is not contesting that the Southern District of New York has personal jurisdiction over Defendant. Mr. Frost requested an extension of Defendant's time to file an answer in this matter until July 6, 2022 so that local counsel could be obtained. As Mr. Frost is not currently admitted in This District, the undersigned is conveying this request to the Court. Plaintiff does not oppose Defendant having until July 6, 2022 to file an answer to the Complaint. Plaintiff also respectfully requests that the deadline to file the Case Management Plan, which is currently June 30, 2022 be extended until July 20, 2022, and that the Initial Conference currently scheduled for July 6, 2022 at 4:00 p.m. be rescheduled to a date after July 20, 2022. The reason for this request is that the undersigned would like sufficient time to review Defendant's answer and discuss the Case Management Plan with opposing counsel and local counsel has not yet been retained. Plaintiff thanks the Court for its consideration herein.

Very truly yours,

/s/

Evan Brustein